

February 19, 2004

Question:

How should Weight of Evidence (WOE) procedures used to support an 8-hour ozone standard attainment demonstration modeling analysis be applied for areas participating in the 8-hour ozone Early Action Compact (EAC) program?

Answer:

The EPA's draft 8-hour ozone modeling guidance, which EAC areas should follow in developing their attainment demonstrations, refers to the use of WOE under limited circumstances when the modeled attainment test either narrowly passes or fails to pass. The draft guidance (Table 2.1) contains rules of thumb for assessing whether a WOE determination may be appropriate. WOE is used to support 8-hour ozone standard attainment demonstrations for State implementation plans (SIPs), including demonstrations for EACs. Modeling is required to show that collective control strategies will reduce ozone to concentrations below the air quality standard by the area's attainment date. When the modeled attainment test is not passed or narrowly passes, EPA's draft guidance discusses the use of additional corroborative analyses to support the attainment demonstration.

One of the underlying premises of the voluntary EAC program is that participating areas commit to early action implementing control measures needed for attainment; and EPA's expectation is that compact areas will commit to implement quantifiable local control strategies to reduce the emissions of ozone precursors. Use of WOE procedures is not intended to be a substitute for implementing quantifiable local control measures. Section C, "Modeling" of the *"Protocol for Early Action Compact Designed to Achieve and Maintain the 8-Hour Ozone Standard"* (the Protocol) states "Quantifiable emission reduction measures will be integrated into the future case to produce one or more control cases. These control cases will be used to indicate the relative effectiveness of different measures and aid in selecting appropriate measures." Section D, "Control Strategies" goes on to state that "The local plan shall include measures that are specific, quantified, and permanent, and that if approved by EPA, will be Federally enforceable SIP revisions."

Clearly, in addition to federal measures, the EAC area must agree to implement some quantifiable local control measures to better ensure attainment by 2007. Then, if modeling that includes the new local control measures, conducted in accordance with EPA guidance and approval, does not pass the attainment test for 2007, the area may apply WOE procedures as specified in EPA's draft guidance as part of the attainment demonstration. The further the attainment test is from being passed, the more compelling contrary evidence produced by corroboratory analyses must be to draw a conclusion differing from that implied by the test results.